

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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WILLIAM FIGUEROA,

Petitioner,

20cv3013 (JGK)

- against -

ORDER

KEYSER,

Respondent.

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JOHN G. KOELTL, District Judge:

The Court has received the attached letter from the petitioner which it now files. Chambers will mail a copy of this order to the pro se petitioner.

SO ORDERED.

Dated: New York, New York  
June 3, 2020

\_\_\_\_\_/s/ John G. Koeltl\_\_\_\_\_  
John G. Koeltl  
United States District Judge

William Figueroa-91-A-2142  
Sullivan Correctional Facility  
P.O. Box 116  
Fallsburg, NY 12733

Dated: May 19, 2020

Hon. John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Figueroa v. Keyser, 20-CV-3013(JLK)

Dear Judge Koeltl:

Please Take Notice, on May 13 & 14, 2020 three prisoner who locked in cell No.#235, 151, 263 that are in close proximity A-north quarantine cells were removed from A-north due to the display of Covid-19 symptoms. The petitioner has filed a grievance complaint, addressing his dissatisfaction with the respondent's housing potentially infected prisoners in A-north, however, his grievance has yet to be addressed by the respondent William F. Keyser, and it was filed in April, 2020. The actions of Sullivan's Correctional staff are imposing an excessive risk to the health and safety of the petitioner; that is outside the scope of reasonable care. Helling v. McKinney, 509 US 25, 331-32.

1. There have been Multiple Correction officers that have tested positive for Covid-19 and there is no doubt that Covid-19 was introduce into this facility by DOCCS employee's. Many Sullivan Correctional Officers work in close proximity to prisoners and in one particular case an Officer that worked in the facility chapel tested positive for Covid-19 and possibly infected multiple prisoners, that worked around that officer. Instead of the respondent conducting a trace of these individuals who worked around that Officer that tested positive, the respondent simply took the one individual who worked around the officer who tested positive and quarantined his known associates, and prisoners who he worked around in A-north's quarantine cells in an attempt to avoid a direct correlation of infection from DOCCS employee to prisoner. Allowing many other prisoners who were exposed to this officer to be free to spread Covid-19.

2. I am 57 years old, with "Psoriasis" a health serious condition. Which I am at a high risk of a life or death, thus being I live with in the State prison system during this Public Health Crisis, (COVID-19). As the infection rate is spreading and has risen in the prison; (I am in Sullivan Correctional Facility). I am not safe and my health and life is on the line, in that there are twelve more inmates and counting that have tested positive and counting it's so bad that even a housing

unit, B-north, has now been placed on lock down. (Quarantine) as of May 18, the confirmed number of prisoner's who have tested positive for COVID-19 has risen to twelve.

3. Here, petitioner argue's that the guilt or innocence of the petitioner is dependent on the validity of the Brady violation's. The Kings County District Attorney claimed that the DD-5's [176 & 197] and related records would, as stated by the ADA, do serious damage to the People case. [Pre-Trial Transcripts of Ms. Crosley 12/14/90, page 39). I need to know exactly how I should proceed with obtaining the above referenced documents from the KCDA, who adamantly refuse to disclose them. The United States Supreme Court established that the District Attorney must turn over all evidence that might exonerate the petitioner to the defense. Brady v. Maryland, 373 US 83 (1963). Wherein the DD-5's are evidence of "actual innocence" and denial of such is a miscarriage of justice. Thank you for your consideration in this matter. It is so prayed.

Sincerely

A handwritten signature in black ink, appearing to read 'William Figueroa', with a long horizontal flourish extending to the right.

William Figueroa

cc: Matthew Keller, Esq  
Assistant Attorney General  
28 Liberty Street  
New York, NY 10005

File

**SULLIVAN CORRECTIONAL FACILITY**  
P.O. BOX 116  
FALLSBURG, NEW YORK 12733-0116

NAME: William Figueroa

DIN: 91-A-2142

Legal Mail

SULLIVAN



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CORRECTIONAL FACILITY



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To: Hon. John G. Koeltl  
United States District Judge  
U.S. District Court  
Southern District of New York  
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